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*Attorneys for Plaintiff  
The United States of America*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

STEPHEN T. PARSHALL,  
aka "Kiwi"  
ANDREW LYNAM, and  
WILLIAM L. LOOMIS,

Defendants.

**CRIMINAL INDICTMENT**

Case No.: 2:20-cr- 128

**VIOLATIONS:**

18 U.S.C. §§ 844 (f), (i), and (n) –  
Conspiracy to damage and destroy by fire  
and explosive; and

26 U.S.C. §§ 5841, 5861(d), and 5871 –  
Possession of unregistered firearms.

THE GRAND JURY CHARGES THAT:

**COUNT ONE**

**Conspiracy**

1. Beginning from at least in or about April 2020 and continuing up to and including  
on or about May 30, 2020, in the State and Federal District of Nevada, and elsewhere,

**STEPHEN T. PARSHALL,  
aka "Kiwi"  
ANDREW LYNAM, and  
WILLIAM L. LOOMIS,**

1 defendants herein, and others known and unknown, knowingly combined, conspired,  
2 confederated, and agreed to commit the following offenses against the United States, in  
3 violation of Title 18, United States Code, Section 844(n), that is:

4 a. to maliciously damage and destroy, by means of fire and explosives,  
5 buildings and other personal or real property, in whole and in part owned possessed by or  
6 leased to the United States, a department and agency of the United States by means of fire  
7 and explosive, in violation of Title 18, United States Code, Section 844(f); and

8 b. to maliciously damage and destroy, by means of fire and explosives,  
9 buildings and other personal and real property, used in interstate commerce and in any  
10 activity affecting interstate commerce, in violation of Title 18, United States Code, Section  
11 844(i);

12 All in violation of Title 18 United States Code, Sections 844(f), (i), and (n).

13 COUNT TWO

14 Possession of an Unregistered Firearm

15 2. On or about May 30, 2020, in the State and Federal District of Nevada,

16 **STEPHEN T. PARSHALL,**

17 **aka "Kiwi"**

18 **ANDREW LYNAM, and**

19 **WILLIAM L. LOOMIS,**

20 defendants herein, possessed firearms, specifically destructive devices, as that term is  
21 defined in Title 18 United States Code, Section 5845(f), that were not registered to them in  
22  
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24

1 the National Firearms Registration and Transfer Record, all in violation of Title 26 United  
2 States Code, Sections 5841, 5861(d), and 5871.

3  
4 **DATED:** this 17<sup>th</sup> day of June, 2020.

5 **A TRUE BILL:**

6  
7 /S/  
8 FOREPERSON OF THE GRAND JURY

9 NICHOLAS A. TRUTANICH  
10 United States Attorney

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12 NICHOLAS D. DICKINSON  
13 Assistant United States Attorney  
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